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February 20, 201

VIA OVERNIGHT DELIVERY

Mr. Mark Wayner
Southwest Region Air Program Manager
PA Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745

**Re: Conemaugh Power Plant (Permit No. TV-32-00059)
Units 1 and 2 (TVOP Source ID Nos. 031 and 032)
Mercury and Air Toxics Standards (MATS) Request for Extension from Monitoring
and Reporting Requirements during Startup and Shutdown**

Dear Mr. Wayner:

With this submittal GenOn Northeast Management Company ("GenOn"), operator of Conemaugh Power Plant ("Conemaugh") requests an extension to the MATS startup and shutdown monitoring and reporting requirements until the requirements are finalized from the MATS revisions proposed on February 17, 2015.

On November 19, 2014 the Environmental Protection Agency ("EPA") finalized Reconsideration of Certain Startup/Shutdown Issues for the MATS rule. In their direct final rule EPA added monitoring provisions during periods of startup and shutdown.

§ 63.10020 How do I monitor and collect data to demonstrate continuous compliance?

(e) Additional requirements during startup periods or shutdown periods.

(1) During each period of startup, you must record for each EGU:

(i) The date and time that clean fuels being combusted for the purpose of startup begins;

(ii) The quantity and heat input of clean fuel for each hour of startup;

(iii) The electrical load for each hour of startup;

(iv) The date and time that non-clean fuel combustion begins; and

(v) The date and time that clean fuels being combusted for the purpose of startup ends.

(2) During each period of shutdown, you must record for each EGU:

- (i) The date and time that clean fuels being combusted for the purpose of shutdown begins;*
- (ii) The quantity and heat input of clean fuel for each hour of shutdown;*
- (iii) The electrical load for each hour of shutdown;*
- (iv) The date and time that non-clean fuel combustion ends; and*
- (v) The date and time that clean fuels being combusted for the purpose of shutdown ends.*

EPA also added additional startup and shutdown requirements for units not employing particulate matter ("PM") continuous emission monitoring systems ("CEMS") or PM continuous parametric monitoring system ("CPMS") or units that have not demonstrated low emitting EGU ("LEE") status for PM:

(3) For PM or non-mercury HAP metals work practice monitoring during startup periods, you must monitor and collect data according to this section and the site-specific monitoring plan required by § 63.10011(l).

(i) Except for an EGU that uses PM CEMS or PM CPMS to demonstrate compliance with the PM emissions limit or that has LEE status for filterable PM or total non-Hg HAP metals for non-liquid oil-fired EGUs (or HAP metals emissions for liquid oil-fired EGUs), or individual non-mercury metals CEMS you must:

(A) Record temperature and flow rate of post-combustion (exhaust) gas and amperage of forced draft fan(s) upstream of each filterable PM control device during each hour of startup.

(B) Record temperature and flow rate of exhaust gas and amperage of induced draft fan(s) downstream of each filterable control device during each hour of startup.

(C) For an EGU with an electrostatic precipitator, record the number of fields in service, as well as each field's secondary voltage and secondary current during each hour of startup.

(D) For an EGU with a fabric filter, record the number of compartments in service, as well as the differential pressure across the baghouse during each hour of startup.

(E) For an EGU with a wet scrubber needed for filterable PM control, record the scrubber liquid to fuel ratio and the differential pressure of the liquid during each hour of startup.

GenOn expects the Conemaugh units to qualify as a LEE, but LEE requires quarterly testing for three years to demonstrate unit emissions are 50% or less than the filterable PM standard of 0.03 lb/MMBtu. Further on February 17, 2015 EPA proposed revisions to the MATS rule that included a revision to the startup and shutdown monitoring provisions.

§ 63.10020 How do I monitor and collect data to demonstrate continuous compliance?

(e) Additional requirements during startup periods or shutdown periods if you choose to rely on paragraph (2) of the definition of 'startup' in § 63.10042 for your EGU. (emphasis added)

The important change to the provision in the proposed revision above is specifying the additional requirement only applies to units relying on paragraph (2) of the startup definition.

§63.10042 What definitions apply to this subpart?

Startup means:

- (1) Either the first-ever firing of fuel in a boiler for the purpose of producing electricity, or the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on-site use). Any fraction of an hour in which startup occurs constitutes a full hour of startup; or*
- (2) The period in which operation of an EGU is initiated for any purpose. Startup begins with either the firing of any fuel in an EGU for the purpose of producing electricity or useful thermal energy (such as heat or steam) for industrial, commercial, heating, or cooling purposes (other than the first-ever firing of fuel in a boiler following construction of the boiler) or for any other purpose after a shutdown event. Startup ends 4 hours after the EGU generates electricity that is sold or used for any other purpose (including on site use), or 4 hours after the EGU makes useful thermal energy (such as heat or steam) for industrial, commercial, heating, or cooling purposes (16 U.S.C. 796(18)(A) and 18 CFR 292.202(c)), whichever is earlier. Any fraction of an hour in which startup occurs constitutes a full hour of startup.*

Conemaugh plans to use paragraph (1) of the startup definition, which would eliminate the requirement to monitor and report semiannually according to §63.10031(c)(5)(ii) startup and shutdown parameters assuming the revisions are finalized as proposed. Conemaugh is requesting that the Department grant an extension to the monitoring and reporting requirements of §63.10020(e) until EPA finalizes the revisions proposed on February 17, 2015. The startup and shutdown data would require a significant effort to setup the distributed control system ("DCS") to run reports to include this data in the semiannual reports and GenOn would prefer to not invest the resources for this effort when the requirement may not exist after the first semiannual reporting period ending June 30, 2015.

Attachments

The following forms and informational attachments are included in this request.

- | | |
|--------------|---|
| Attachment A | Request for MATS Compliance Extension Form |
| Attachment B | Request for Waiver of Recordkeeping and/or Reporting Requirements |

GenOn respectfully requests that an extension from monitoring and reporting startup and shutdown parameters be granted until the revisions proposed on February 17, 2015 are finalized. GenOn acknowledges that this request is being made within 120 days of the April 16, 2015 compliance date, but also notes that the proposed revisions that would eliminate the startup and shutdown requirements were proposed within 120 days of the rule and GenOn developed this

Mr. Mark Wayner
February 19, 2015
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request as soon as practicable from the date the revisions were published in the Federal Register.
If you have any questions, comments or require further information, please contact me or Keith Schmidt at (724) 597-8193 (keith.schmidt@nrg.com).

Sincerely,

A handwritten signature in black ink, appearing to read "B. W. Green", with a stylized flourish at the end.

Brian W. Green
Senior Air Quality Specialist

Attachments

CC: Mark Gorog, DEP

ATTACHMENT A

Request for MATS Compliance Extension Form

RECEIVED

FEB 23 2015 June 14, 2002, Version Final

Request for Extension of Compliance

AIR QUALITY
DEPT ENVIRONMENTAL PROTECTION

**THIS IS A SAMPLE NOTIFICATION FORM, WHICH CAN BE USED BY FACILITIES
AT THEIR DISCRETION TO MEET COMPLIANCE
WITH 40 CFR 63 Subpart A, §63.9(c) and/or §63.6(i)**

Applicable Rule: 40 CFR Part 63, Subpart A — National Emission Standards for Hazardous Air Pollutants for Source Categories, Subpart A — General Provisions. Request for extension of compliance is being made in accordance with §63.9(c) and/or §63.6(i).

NOTE: Until an extension of compliance has been granted by the Administrator (or State with an approved permit program), the owner or operator of an affected source subject to a part 63 standard shall comply with all applicable requirements of that standard (§63.6(i)(1)).

Requests for extension of compliance with a relevant standard are due not later than 120 days prior to the affected source's compliance date [as specified in §63.6(b) and (c)] except as noted below. Emissions standards established under this part may specify an alternative date (e.g., other than 120 days) for the submittal of requests for an extension of compliance if alternatives are appropriate for the source categories affected by those standards. Please check the relevant standard for alternative submittal dates. (§63.6(i)(4)(i)(B))

- An owner or operator of an existing source unable to comply with a relevant standard established under this part pursuant to section 112(f) of the Act may request that the Administrator grant an extension allowing the source up to 2 years after the standard's effective date to comply with the standard. The Administrator may grant such an extension if he/she finds that such additional period is necessary for the installation of controls and that steps will be taken during the period of the extension to assure that the health of persons will be protected from imminent endangerment. All such requests for an extension of compliance with a relevant standard are due not later than **90 calendar days after the effective date** of the relevant standard. (§63.6(i)(4)(ii), §63.6(i)(3))
- An owner or operator of an existing source that has installed BACT or technology required to meet LAER [as specified in (§63.6(i)(2)(ii))] prior to the promulgation of a relevant emission standard in this part may request that the Administrator grant an extension allowing the source 5 years from the date on which such installation was achieved, as determined by the Administrator, to comply with the standard. The Administrator may grant such an extension if he or she finds that the installation of BACT or technology to meet LAER controls the same pollutant (or stream of pollutants) that would be controlled at that source by the relevant emission standard. All such requests for an extension of compliance with a relevant standard are due not later than **120 days after the promulgation date** of the standard. (§63.6(i)(5), §63.6(i)(2)(ii))
- An owner or operator of an affected source may submit a compliance extension request if the existing source demonstrates that it has achieved a reduction in emissions of hazardous air pollutants in accordance with the provisions of subpart D, Regulations Governing Compliance Extensions for Early Reductions of Hazardous Air Pollutants. The early reduction program is not discussed here, please see Subpart D for further information (§63.6(i)(2)(i))

SECTION I GENERAL INFORMATION

A. Print or type the following information for each facility for which you are requesting an extension of compliance (§63.9(b)(2)(i)-(ii))

Operating Permit Number (OPTIONAL)		Facility I.D. Number (OPTIONAL)	
32-00059			
Responsible Official's Name/Title			
John A. Balog/ General Manager – Conemaugh			
Street Address			
1442 Power Plant Road			
City	State	ZIP Code	
New Florence	PA	15944	
Facility Name (if different from Responsible Official's Name)			
Conemaugh Power Plant			
Facility Street Address (If different than Responsible Official's Street Address)			
Same as Responsible Official's			
Facility Local Contact Name		Title	Phone (OPTIONAL)
City	State	ZIP Code	

B. Indicate the relevant standard or other requirement that is the basis for this request for this compliance extension request:

40 CFR Part 63 Subpart UUUUU § 63.10020(e) - MATS startup and shutdown monitoring requirements

C. I am eligible to apply for a compliance extension for the following reasons: (check all that apply)

- ☒ I am unable to comply with the relevant standard and need additional time for the installation of controls (§63.6(i)(4)(i)(A))
- ☐ I installed best available control technology (BACT) or lowest achievable emission rate (LEAR) prior to promulgation of the relevant standard (§63.6(i)(2)(ii))
- ☐ I am participating in an early reductions program (63.6(i)(2)(i)). If you check this box, this is the **END OF FORM**. Please see Subpart D for further instruction.

D. Are you submitting this compliance extension request less than times indicated on page 1 for submitted an extension request? (§63.6(i)(4)(i)(C))

☒ Yes ☐ No

If you answered yes, state the reasons why additional time is needed and the date when you first learned of the problems. (§63.6(i)(4)(i)(C))

Reasons why additional time is needed

Proposed revisions potentially eliminating the burdensome requirements were published 02/17/15

Date (mm/dd/yy) first learned of the problems

11/19/2015 - when the direct final rule was published

E. Are you requesting a waiver of the initial performance test required under the applicable relevant standard in conjunction with this request for an extension of compliance? (§63.7(h)(3)(i)-(iii))

☐ Yes ☒ No

If you answered yes, you must submit the application for a waiver of the initial performance test together with this request for an extension of compliance. The application for waiver shall include information justifying the request for a waiver, such as the technical or economic infeasibility, or the impracticality, of the affected source performing the required test. (§63.7(h)(3)(i)-(iii))

F. Are you requesting a waiver of recordkeeping and/or reporting requirements under the applicable relevant standard in conjunction with this request for an extension of compliance? (§63.10(f)(3))

☒ Yes ☐ No

If you answered yes, you must submit the application for a waiver of recordkeeping and/or reporting requirements together with this request for an extension of compliance. The application for waiver should include whatever information you consider useful to convince the Administrator that a waiver of recordkeeping and/or reporting is warranted. (§63.10(f)(3))

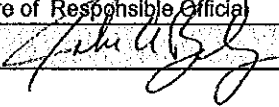
G. If you are unable to comply based on the need for additional time to install controls, **complete Sections II. and III.**

If you have installed BACT or LEAR, **complete Sections II, III, and IV.**

SECTION II

CERTIFICATION (Note: you may edit the text in this section as deemed appropriate)

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify the information contained in this request is accurate and true to the best of my knowledge.

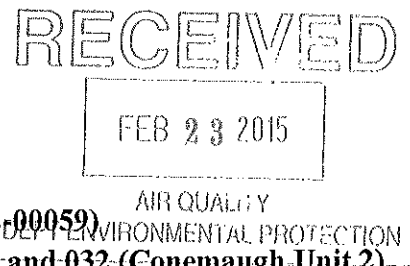
Name of Responsible Official (Print or Type)	Title	Date (mm/dd/yy)
John A. Balog	General Manager - Conemaugh	2/19/2015
Signature of Responsible Official		
		

Note: Responsible official is defined under §63.2 as any of the following: the president, vice-president, secretary, or treasurer of the company that owns the plant; the owner of the plant; the plant engineer or supervisor; a government official if the plant is owned by the Federal, State, city, or county government; or a ranking military officer if the plant is located on a military installation.

ATTACHMENT B

Request for Waiver of the Initial Performance Test

ATTACHMENT B



Conemaugh Power Plant (TVOP# 32-00059)
Title V Operating Permit ID Nos. 031 (Conemaugh Unit 1) and 032 (Conemaugh Unit 2)

Request for Waiver of Recordkeeping and/or Reporting Requirements

40 CFR 63 Subpart UUUUU requires reporting and recordkeeping as specified below:

§ 63.10020 How do I monitor and collect data to demonstrate continuous compliance?

(e) Additional requirements during startup periods or shutdown periods.

(1) During each period of startup, you must record for each EGU:

- (i) The date and time that clean fuels being combusted for the purpose of startup begins;*
- (ii) The quantity and heat input of clean fuel for each hour of startup;*
- (iii) The electrical load for each hour of startup;*
- (iv) The date and time that non-clean fuel combustion begins; and*
- (v) The date and time that clean fuels being combusted for the purpose of startup ends.*

(2) During each period of shutdown, you must record for each EGU:

- (i) The date and time that clean fuels being combusted for the purpose of shutdown begins;*
- (ii) The quantity and heat input of clean fuel for each hour of shutdown;*
- (iii) The electrical load for each hour of shutdown;*
- (iv) The date and time that non-clean fuel combustion ends; and*
- (v) The date and time that clean fuels being combusted for the purpose of shutdown ends.*

(3) For PM or non-mercury HAP metals work practice monitoring during startup periods, you must monitor and collect data according to this section and the site-specific monitoring plan required by § 63.10011(l).

- (i) Except for an EGU that uses PM CEMS or PM CPMS to demonstrate compliance with the PM emissions limit or that has LEE status for filterable PM or total non-Hg HAP metals for non-liquid oil-fired EGUs (or HAP metals emissions for liquid oil-fired EGUs), or individual non-mercury metals CEMS you must:*

- (A) Record temperature and flow rate of post-combustion (exhaust) gas and amperage of forced draft fan(s) upstream of each filterable PM control device during each hour of startup.*
- (B) Record temperature and flow rate of exhaust gas and amperage of induced draft fan(s) downstream of each filterable control device during each hour of startup.*
- (C) For an EGU with an electrostatic precipitator, record the number of fields in service, as well as each field's secondary voltage and secondary current during each hour of startup.*
- (D) For an EGU with a fabric filter, record the number of compartments in service, as well as the differential pressure across the baghouse during each hour of startup.*

ATTACHMENT B

(E) For an EGU with a wet scrubber needed for filterable PM control, record the scrubber liquid to fuel ratio and the differential pressure of the liquid during each hour of startup.

§ 63.10031 What reports must I submit and when?

(c) The compliance report must contain the information required in paragraphs (c)(1) through (5) of this section.

(5) For each instance of startup or shutdown:

(i) Include the maximum clean fuel storage capacity and the maximum hourly heat input that can be provided for each clean fuel determined according to the requirements of §63.10032(f).

(ii) Include the information required to be monitored, collected, or recorded according to the requirements of §63.10020(e).

(iii) If you choose to use CEMS for compliance purposes, include hourly average CEMS values and hourly average flow rates. Use units of milligrams per cubic meter for PM CEMS, micrograms per cubic meter for Hg CEMS, and ppmv for HCl, HF, or SO₂ CEMS. Use units of standard cubic meters per hour on a wet basis for flow rates.

(iv) If you choose to use a separate sorbent trap measurement system for startup or shutdown reporting periods, include hourly average mercury concentration in terms of micrograms per cubic meter.

(v) If you choose to use a PM CPMS, include hourly average operating parameter values in terms of the operating limit, as well as the operating parameter to PM correlation equation.

§ 63.10032 What records must I keep?

(f) Regarding startup periods or shutdown periods:

- (1) You must keep records of the occurrence and duration of each startup or shutdown;
- (2) You must keep records of the determination of the maximum clean fuel capacity for each EGU;
- (3) You must keep records of the determination of the maximum hourly clean fuel heat input and of the hourly clean fuel heat input for each EGU; and
- (4) You must keep records of the information required in §63.10020(e).in § 63.8(d)(3).

GenOn Northeast Management Company ("GenOn") requests a waiver from Mercury and Air Toxics Standards ("MATS") recordkeeping and/or reporting requirements detailed above for Title V Operating Permit ID Nos. 031 (Conemaugh Unit 1) and 032 (Conemaugh Unit 2), (the "Units"). This waiver request accompanies the MATS Request for Extension from Monitoring and Reporting Requirements during Startup and Shutdown. GenOn will comply with all other requirements of the MATS rule as required.

GenOn requests DEP grant Conemaugh a waiver from the startup and shutdown recordkeeping and reporting requirements until the revisions proposed on February 17, 2015 are finalized.

ATTACHMENT B

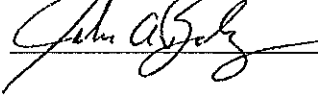
CERTIFICATION

Based upon information and belief formed after a reasonable inquiry, I, as a responsible official of the above-mentioned facility, certify that the statements contained in this request are true, accurate and complete to the best of my knowledge.

Name of Responsible Official, Title

John A. Balog, General Manager - Conemaugh

Signature of Responsible Official, Date

 2/19/2015